

EXHIBIT 4

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October 12, 2023

By Email

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**Re: United States ex rel. Long v. Janssen Biotech, Inc.,
No. 16-cv-12182 (D. Mass.)**

Dear Counsel:

We are transmitting to you today via email and secure file transfer Janssen's updated privilege log, production volumes JANSSENBIO-064 and JANSSENBIO-065, and supplemental production volumes JANSSENBIO-012_SUPP, JANSSENBIO-021_SUPP_03, JANSSENBIO-

COVINGTON

Theodore Leopold, et al.
October 12, 2023
Page 2

030_SUPP, JANSSENBIO-047_SUPP, JANSSENBIO-048_SUPP, JANSSENBIO-052_SUPP, JANSSENBIO-053_SUPP, JANSSENBIO-058_SUPP, JANSSENBIO-060_SUPP, JANSSENBIO-061_SUPP, and JANSSENBIO-063_SUPP.

For your convenience so you have everything in one place, Janssen's updated privilege log includes the entries that were previously identified to you on privilege logs dated October 31, 2021, February 22, 2022, and March 3, 2023, as well as additional entries pertaining to privileged materials identified over the course of discovery.

Production Volume JANSSENBIO-064 includes documents Bates numbered JANSSENBIO-064-00000001 to JANSSENBIO-064-00010710. Production Volume JANSSENBIO-065 includes documents Bates numbered JANSSENBIO-065-00000001 to JANSSENBIO-065-00000004. Both productions consist of responsive non-privileged materials that were identified in the course of Janssen's review of potentially privileged documents, as well as documents which are produced with privileged content redacted.

We are also producing several "supplemental" productions. These productions, identified by the abbreviation "SUPP" in the production volume name, contain replacement files for a number of documents that were previously produced, and are now being fully or partially clawed back or downgraded based on further review.

The production of materials in today's productions is not intended as a waiver of any form of privilege, and, as Janssen has clearly and consistently maintained, it has no intention of waiving privilege in this case. Furthermore, as agreed upon by the parties in the Protective Order, any disclosure of privileged material in this matter is not intended to and does not constitute a waiver or forfeiture of any privilege otherwise attaching to that information or its subject matter. Consistent with Exhibit B, Section III of the stipulated Protective Order, and with the parties' mutual obligations under Federal Rule of Civil Procedure 26 and the Court's Local Rules, we ask that you promptly inform us if you believe any materials may be protected by the attorney-client privilege, attorney work product, or any other applicable privilege were produced so that we can review and claw back those materials as appropriate.

These productions complete Janssen's production of relevant materials within the court-ordered scope of this phase of discovery. At this time, Janssen does not anticipate making any further productions within this phase.

The productions are password protected. We will provide the password for the productions in a separate communication. Please let us know if you have any issues accessing the documents in the productions.

Documents included in today's productions have been designated Confidential and are subject to protection under the Protective Order entered in this case.

Sincerely,

s/ Nicholas Pastan
Nicholas Pastan